Tiffany (NJ) Inc. et al v. eBay Inc. Doc. 23

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TIFFANY (NJ) INC. and TIFFANY AND COMPANY, Plaintiffs, v. eBAY INC., Defendant.	04 Civ. 4607 (NRB)

SUPPLEMENTAL DECLARATION OF R. BRUCE RICH
IN SUPPORT OF EBAY'S MOTION TO AMEND ITS ANSWER

I, R. BRUCE RICH, declare as follows:

1. I am admitted to practice before this Court and am a partner with the firm of Weil, Gotshal & Manges LLP, which represents eBay Inc. ("eBay") in the above captioned matter.

2. I submit this supplemental declaration in support of eBay's motion to amend its Answer.

3. Annexed hereto as Exhibit 1 are true and accurate copies of documents produced by Tiffany at TCO 003576-81 and 011953-60.

4. Annexed hereto as Exhibit 2 is a true and accurate copy of email correspondence between Tiffany employee Ewa Zalewska, and an eBay user. This document was produced by Tiffany at TCO 005204.

5. Annexed hereto as Exhibit 3 is a true and accurate copy of portions of the transcript of Ms. Annamarie Sandecki's deposition, which took place on July 21, 2005.

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6. Annexed hereto as Exhibit 4 is a true and accurate copy of the webpage, http://pages.ebay.com/help/community/vero-aboutme.html

7. I declare under penalty of perjury that the foregoing is true and correct.

Executed: September 13, 2005
New York, New York

By: ______________________
R. Bruce Rich